

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

**ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING AND
CONSOLIDATE WITH SENTENCING HEARING IN RELATED MATTER**

Defendant Hieu Minh Ngo respectfully moves to continue his sentencing hearing in this matter and to consolidate that sentencing hearing with Mr. Ngo's sentencing hearing in the related matter of United States v. Hieu Ming Ngo a/k/a "Minh Hieu Ngo," 14-CR-81-PB (the "Related Matter"). The United States, through AUSA Arnold Huftalen, assents to the requested relief. In support of this Motion, Mr. Ngo states as follows:

1. Mr. Ngo has entered a guilty plea in this matter and is scheduled to be sentenced on September 25, 2014.

2. Mr. Ngo has entered into a plea agreement in connection with the Related Matter, and a change of plea hearing in the Related Matter is scheduled for Thursday, August 21, 2014.

3. Mr. Ngo is also scheduled to be a trial witness in the matter of United States v. Lance Early, 3:13-175, which is pending in the Southern District of Ohio – Western Division. Trial in that matter is scheduled to commence in October 2014.

4. In light of Mr. Ngo's imminent change of plea in the Related Matter and the fact that he is scheduled to be a trial witness in the Southern District of Ohio in October 2014, Mr.

Ngo respectfully moves the Court to continue the sentencing hearing scheduled for September 25, 2014 and to consolidate Mr. Ngo's sentencing in this matter with his sentencing in the Related Matter (which has not yet been scheduled). Mr. Ngo respectfully seeks that his sentencing be continued to a date in late 2014, in order to allow Mr. Ngo to testify in the Ohio trial prior to being sentenced in this matter and the Related Matter.

5. Consolidation of sentencing in this matter and the Related Matter will promote judicial economy and conserve resources by, among other things, allowing the United States Probation Office to prepare one Pre-sentence Report instead of two.

6. AUSA Huftalen has advised that the Government assents to the relief requested.

7. Due to the discretionary nature of the relief requested herein, no memorandum of law is required.

WHEREFORE, Mr. Ngo respectfully requests that this Honorable Court enter an Order:

A. Continuing his sentencing in this matter from September 25, 2014 to a date in late 2014;

B. Consolidating his sentencing in this matter with his sentencing in the Related Matter; and

B. Granting such other relief as the Court deems proper.

Respectfully submitted,

HIEU MINH NGO,

By his Attorney,

Dated: August 20, 2014

/s/ Michael J. Connolly

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CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing has been delivered to all counsel of record.

/s/ Michael J. Connolly
Michael J. Connolly